Robert T. Quasius

Marshall, MN 56258

January 3, 2007

MUR # 5896

Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, D.C. 20463

Enclosed is a formal complaint against the Americans for Legal Immigration PAC (ALIPAC) for violation of campaign finance laws.

Feel free to contact me (above) if you need further information.

Yours truly,

Robert T. Quasius

FEDERAL ELECTION
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
7007 IAN 10 A 9: 0:

MUR # 5896

COMPLAINT

The Americans for Legal Immigration PAC is a Section 527 organization under various campaign finance laws, and was required to report all campaign contributions to the Federal Election Commission as required by the Bipartisan Campaign Reform Act of 2002 ("the Act") and other federal campaign finance statutes and the code of federal regulations (CFR Title 11).

According to Exhibit A, ALIPAC's report of receipts and disbursements through November 27, 2006, ALIPAC made cash contribution(s) of \$1,500 to the Committee to Elect John Jacob.

However, in Exhibit B, the contribution report of the Committee to Elect John Jacob, lists two donations of \$1,000 each, for a total of \$2,000. ALIPAC failed to submit accurate reports as required by the Act.

Additionally, ALIPAC operates a web site that receives very heavy internet traffic. For the month of October, 2006, ALIPAC was projecting over 2,500,000 web views on their web site, in an announcement posted on the web site. Exhibit D lists the candidates endorsed by ALIPAC who received in-kind contributions from the web site, and Exhibit E is the announcement about monthly web views, posted on the web site.

None of the in-kind support from the ALIPAC web site is reported on any campaign finance reports either from ALIPAC or any of their endorsed candidates. Additionally, of the \$46,143 in disbursements, upon information and belief at least a portion of this expense resulted in similar in-kind contributions to ALIPAC's endorsed candidates, such as travel expenses for Mr. Gheen to speak in support of endorsed candidates, telephone calls, etc. The ALIPAC is neither a media organization nor an individual blogger under the Act and the Commission's internet guidelines.

Exhibit E is a fund raising e-mail sent to over 7,000 individuals on behalf of ALIPAC endorsed candidates. There was no in-kind contributions reported by either ALIPAC or any ALIPAC endorsed candidates for the cost of equipment, software, etc. required to distribute this e-mail, as required by the Commission.

Robert T. Quasius

Marshall, MN 56258

Signed and sworn before me

tary of the State of Minnesota

JESSICA L JENNIGES
Notary Public
Minnesota
My Commission Expires Jan. 31, 2011

Exhibit A – ALIPAC FEC Report of Receipts and Disbursements

Presented by the Federal Election Commission - 2005-2006 Cycle

TRY A: <u>NEW SEARCH</u> RETURN TO: <u>FEC HOME PAGE</u>

AMERICANS FOR LEGAL IMMIGRATION PAC

C00405878	Non-Party Non-Qualified		North Carolina
Total Receipts:		\$46,143	
Transfers From Authorized:		\$0	
Individual Contributions:		\$44,575	
Other Committee Contributions:		\$250	
Other Loans:		\$0	
Non-Federal Transfers:		\$0	
Total Disbursemer	nts:	\$45,801	
Transfers To Authorized:		\$0	
Contributions To Committees:	<u>Other</u>	\$1,500	
Independent Exper	nditures:	\$0	
Coordinated Expenditures:		\$ 0	
Individual Refunds:		\$0	
Other Committee Refunds:		\$0	
Other Loan Repayments:		\$0	
Non-Federal Expenditures:		\$0	
D · · · · ·	1		

Beginning Cash: \$557 Latest Cash On Hand: \$900 Debts Owed By: \$0

Through: 11/27/2006

Exhibit B – FEC Contribution Report for the Committee to Elect John Jacob

Presented by the Federal Election Commission

Contributions Received By This Candidate's Committee(s)

COMMITTEE TO ELECT JOHN JACOB

Party: Republican Party

175 SOUTH WEST TEMPLE SUITE 650 SALT LAKE CITY, Utah 84101

Recipient's Name	Date	Amount	Image Number	
CONTRIBUTIONS				
AMERICANS FOR LEGAL IMMIGRATION PAC	06/20/2006	1000.00	<u>26039141503</u>	
AMERICANS FOR LEGAL IMMIGRATION PAC	06/26/2006	1000.00	<u>26038141503</u>	
UTAH BANKERS ASSOCIATION ACTION PAC	05/07/2006	2000.00	<u>26950224687</u>	
ZIONS BANCORPORATION POLITICAL ACTION COMMITTEE	06/09/2006	1000.00	<u>26950233060</u>	

Exhibit C – ALIPAC List of Endorsed Candidates (source: ALIPAC Web Site)

Alabama

CONGRESS

3rd district ENDORSED Mike Rogers for Congress

Arizona

5th district ENDORSED JD Hayworth for Congress

#8th district ENDORSED Randy Graf for Congress

Arkansas

3rd district ENDORSED John Boozman for Congress

California

US Senate ENDORSED Dick Mountjoy for US Senate, Republican, Challenger (LOSS)

- # 1st district ENDORSED John W. Jones for Congress
- # 2nd district ENDORSED Wally Herger for Congress
- # 18th district ENDORSED John Kanno for Congress
- # 25th district ENDORSED Howard McKeon for

Congress

- # 28th district ENDORSED Stanley Kimmel Kesselman for Congress
- # 29th district ENDORSED William Bodell for Congress
- # 43rd district ENDORSED Scott Folkens for Congress
- # 46th district ENDORSED Dana Rohrabacher for
- Congress
- # 49th district ENDORSED Darrell Issa for Congress
- # 50th district ENDORSED Brian Bilbray for Congress

53rd district ENDORSED John "Woody" Woodrum for Congress

Colorado

- # 3rd district ENDORSED Scott Tipton for Congress
- # 4th district ENDORSED Marilyn Musgrave for Congress
- # 5th district ENDORSED Doug Lamborn for Congress
- # 6th district ENDORSED Tom Tancredo for Congress
- # 7th district ENDORSED Rick O'Donnell for Congress

Connecticut

US Senate ENDORSED Alan Schlesinger for US Senate # 4th district ENDORSED Christopher Shays for Congress

Delaware

US SENATE: ENDORSED Jan Ting for US Senate

Florida

- # 6th district ENDORSED Cliff Stearns for Congress
- #7th district ENDORSED John Mica for Congress
- # 12th district ENDORSED Ed Bowlin for Congress
- # 24th district ENDORSED Tom Feeney for Congress

Georgia

- # 1st district ENDORSED Jack Kingston for Congress
- # 3rd district ENDORSED Lynn Westmoreland for Congress
- # 6th district ENDORSED Thomas Price for Congress
- # 7th district ENDORSED John Linder for Congress
- # 8th district ENDORSED Mac Collins for Congress

9th district ENDORSED Nathan Deal for Congress # 10th district ENDORSED Charlie Norwood, Republican # 11th district ENDORSED Phil Gingrey for Congress # 12th district ENDORSED Max Burns for Congress # 13th district ENDORSED Deborah Honeycutt for Congress

Hawaii

1st district ENDORSED Richard 'Noah' Hough for Congress

Idaho

1st district ENDORSED Bill Sali for Congress

Illinois

2nd district ENDORSED Robert Belin for Congress # 6th district ENDORSED Peter Roskam for Congress # 7th district ENDORSED Charles Hutchinson for Congress

Indiana

4th district ENDORSED Steve Buyer for Congress # 8th district ENDORSED John Hostettler for Congress # 9th district ENDORSED Mike Sodrel for Congress

Iowa

5th district ENDORSED Steve King for Congress

Kentucky

1st district ENDORSED Edward Whitfield for Congress # 4th district ENDORSED Geoff Davis for Congress

Louisiana # 4th district ENDORSED Chester T. Kelley

Maryland
US Senate ENDORSED Michael Steele for US Senate

3rd district ENDORSED John White for Congress # 8th district ENDORSED Jeffrey M. Stein for Congress

Massachusetts

ENDORSED: Kenneth Chase for US Senate (LOSS)

6th district ENDORSED Rick Barton for Congress

Minnesota

6th district ENDORSED Michele Bachmann for Congress

#8th district ENDORSED Rod Grams for Congress

Mississipi

4th district ENDORSED Gene Taylor for Congress

Missouri

US SENATE: ENDORSED Jim Talent for US Senate

5th district ENDORSED Jacob Turk for Congress

Nevada

1st district ENDORSED Kenneth Wegner for CONGRESS

New Hampshire # 1st district ENDORSED Jeb Bradley for Congress

New Jersey
5th district ENDORSED - Scott Garrett for Congress
6th district ENDORSED - Leigh-Ann Bellew for
Congress
12th district ENDORSED Joseph Sinagra for Congress

New York

US SENATE: ENDORSED John Spencer for Senate, Republican, Challenger (LOSS)

1st district ENDORSED Italo Zanzi for Congress # 3rd district ENDORSED Peter King for Congress # 24th district ENDORSED Ray Meier for Congress # 26th district ENDORSED Jack Davis for Congress

North Carolina

3rd district ENDORSED Walter Jones for Congress
4th district ENDORSED Steve Acuff for Congress
7th district ENDORSED Shirley Davis for Congress
10th district ENDORSED Patrick McHenry for Congress
11th district ENDORSED - Charles Taylor for Congress
12th district ENDORSED Dr. Ada Fisher for Congress
13th district ENDORSED Vernon Robinson for Congress

North Dakota
US Senate ENDORSED Dwight Grotberg for US Senate

At Large ENDORSED Matt Mechtel for Congress

Ohio

10th district ENDORSED Michael D. Dovilla for

CONGRESS

15th district ENDORSED Deborah Pryce for CONGRESS

Oregon

1st district Endorsed: Derrick Kitts for Congress

2nd district Endorsed: Greg Walden for Congress

3rd district Endorsed: David Brownlow

4th district Endorsed: Rep. Peter A. DeFazio

5th district Endorsed: Mike Erickson for Congress

Pennsylvania

US SENATE: ENDORSED Rick Santorum for US Senate

CONGRESS

9th district ENDORSED Bill Shuster for Congress

13th district ENDORSED Raj Peter Bhakta for Congress

19th district ENDORSED Todd Platts for Congress

South Carolina

2nd district ENDORSED Joe Wilson for Congress

3rd district ENDORSED J. Gresham Barrett for Congress

4th district ENDORSED William Griff Griffith for

Congress

Tennessee

4th district ENDORSED Ken Martin for Congress

- # 5th district ENDORSED Tom Kovach for Congress # 6th district ENDORSED Robert "Bob" Garrison for
- Congress
- # 7th district ENDORSED Marsha Blackburn
- # 9th district ENDORSED Mark White for Congress

Texas

- # 1st district ENDORSED Louis Gohmert, Jr for Congress
- # 7th district ENDORSED John Culberson for Congress
- # 14th district ENDORSED Ron Paul for Congress
- # 19th district ENDORSED Randy Neugebauer for
- Congress
- # 21st district ENDORSED Lamar Smith for Congress
- # 26th district ENDORSED Michael Burgess for Congress
- # 29th district ENDORSED Eric Story for Congress

Utah

- # 1st district ENDORSED Bob Bishop for Congress
- # 2nd district ENDORSED LaVar Christensen for Congress
- # 3rd district ENDORSED Jim Noorlander for Congress

Virginia

- # 5th district ENDORSED Virgil Goode for Congress
- # 6th district ENDORSED Robert Goodlatte for Congress
- #8th district ENDORSED Tom O'Donoghue for Congress

Washington

7th district ENDORSED Steve Beren for Congress

West Virginia US Senate ENDORSED Senator Robert Byrd

Wisconsin

5th district ENDORSED James Sensenbrenner for Congress

#8th district ENDORSED John Gard for Congress

Exhibit D – Memorandum from William Gheen, President of ALIPAC, Documenting Web Traffic During Elections

ALIPAC

ALIPAC President or Administrator

\$



Joined: Nov 10, 2004

Posts: 13905

D Posted: Mon Oct 23, 2006 10:04 am Post subject: Getting our ALIPAC team quote

together and setting new records!

Supporters of ALIPAC:

We have 15 days till election day.

Please visit ALIPAC often over these final days to make sure you have the latest information.

Also, we need you to focus on anything you can do to help with the elections everyday.

We need everyone working together as a team and taking actions on their own to promote our success.

Also, the next 8 days will be very important because ALIPAC may set a new all time web traffic record for this month.

At the time of this posting (Monday Oct 23), we are at 1,459,567 page views at www.alipac.us for the month.

It would be great news for us to set a new all time web traffic record on the eve of the elections. This will happen if we pass the current record of 2,532,079 page views set in May of 2006!

To help us set a new record this month and to have maximum impact on the elections, please consider the following actions.

- 1. Please visit <u>www.alipac.us</u> everyday and spend as much time on the site and on the volunteer efforts as possible. Make ALIPAC your base of operations as you work to support our endorsed campaigns.
- 2. Read the homepage news and the articles in the News by ALIPAC Activists section in the Discussion Groups each day and post comments.
- 3. Make sure you have reviewed all of the information found in the ALIPAC Action Panel on the top blue tool bar so you can share this info with others.
- 4. Check the National Candidate Endorsements section each day for updates. Review this information and the blacklists for your area and spread the word.
- 5. Send e-mails to friends explaining to them how important this year's elections are and how we need Americans working together on these elections to protect our nation from illegal immigration. Send them our way and help us get them active. New supporters are asked to sign up for our e-mail alerts, as volunteers, and as contributors.
- 6. Place links on other websites and in other online forums showing people the way to www.ALIPAC.us Post links to important articles on our homepage you think others should read. Post links to our candidate endorsement section to increase visibility.
- 7. Check the website traffic levels often to see how we are doing by clicking on the blue number (26,528,161) in the box on the bottom left titled Site Traffic. You will need to click on Detailed Statistics to see how we are doing each day.

We want to set a new record and we want to build our online team up as much as possible for these last two weeks.

We hope to see you here often and we hope to see you taking action.

We need all of the great citizen activists we can get on the ALIPAC team for this final push!

Yours in the cause,

William Gheen Americans for Legal Immigration PAC (ALIPAC)

illegal immigration news in America Enforce our existing immigration laws!

Exhibit E – Fund Raising E-Mail by ALIPAC on Behalf of Endorsed Candidates

From: "Americans for Legal Immigration" < listmaster@alipac.us>

To:

Subject:Please deploy! Our Victory depends on YOU!

Date: Sat, 28 Oct 2006 20:18:56 +0000 (UTC)

(Mailing list information, including unsubscription instructions,

is located at the end of this message.)

Supporters of ALIPAC:

Who wins a campaign is decided by who raises and spends the most money approximately 94% of the time. Our side can win with less money as we face the millions of dollars the Open Borders Lobby aka US Chamber of Commerce is pumping in to their candidates.

We can win with less money because 80% of the public supports our side!

However, both contributions and volunteers are needed on our road to victory. The amount of time you collectively volunteer and contribute will decide many of these races.

The decision of who will win is in your hands and it is based on how many of you respond with your time and your money to support our candidates.

Time+Money X's (number of supporters) ='s VICTORY

VOLUNTEERS

Please locate the campaigns ALIPAC has endorsed in your state and visit their websites. ALIPAC supporters are asked to immediately volunteer to the ENDORSED campaigns you like that are closest to you.

Campaigns need help distributing yard signs, walking door to door, making phone calls, assembling letters, letters to the editor, and so on.

It does not matter if you have never volunteered before. Most campaigns are set up where anyone can help and they will gladly give you easy to follow instructions. Your time as a volunteer can bring many voters to our candidates.

ALL ALIPAC VOLUNTEERS ARE ASKED TO IMMEDIATELY DEPLOY.

Let them know that ALIPAC sent you and you are there because of the candidate's stance on illegal immigration. Many of you are already deployed and we salute those of you willing to join our efforts.

CONTRIBUTIONS

If any of our supports think that this battle can be won without money, you are in for a rude awakening.

While our candidates can win with less money due to the power of our issue, they must receive funds to prevail.

Please locate the campaigns in your state and speak with your family about how much you can contribute. Please try to contribute something to each endorsed campaign in your state.

CONTRIBUTIONS SHOULD BE MAILED EXPRESS MAIL OR MADE THROUGH THE CAMPAIGN WEBSITES AS SOON AS POSSIBLE.

Many campaigns are making tough decisions about what they can and cannot afford to do to reach out to voters in these final days. Any contributions made after Friday of this coming week will be appreciated but less likely to turn into direct voter contact efforts.

For each \$100 you contribute to a campaign, that is another group of voters that will hear from our candidates.

Many of us are speaking with our families and making major sacrifices from our personal budgets to give money directly to the campaigns.

There are over 7,000 people receiving this email. Imagine the huge financial and volunteer impact we can make if most of you respond!

PLEASE REMEMBER THAT NEW CANDIDATES ARE BEING ADDED TO OUR ENDORSEMENTS LIST EACH DAY AS OUR VOLUNTEER RESEARCHERS SCREEN THESE CAMPAIGNS TO MEET YOUR APPROVAL AND THEIR ALIGNMENT WITH ALIPAC'S Platform.

Enter the fray today as a contributor and volunteer via our Endorsement list.

ALIPAC's 2006 List of ENDORSED Candidates at... http://www.alipac.us/modules.php?name=Content&pa=showpage&pid=30

Power goes to those that show up.

ALIPAC

www.alipac.us

Americans for Legal Immigration PAC

The following information is a reminder of your current mailing list subscription:

You are subscribed to the following list:
Americans for Legal Immigration

using the following email:

You may automatically unsubscribe from this list at any time by visiting the following URL:

<http://lists.alipac.us/cgi-bin/dada/mail.cgi/u/ALI/>

If the above URL is inoperable, make sure that you have copied the entire address. Some mail readers will wrap a long URL and thus break this automatic unsubscribe mechanism.

You may also change your subscription by visiting this list's main screen:

<http://lists.alipac.us/cgi-bin/dada/mail.cgi/list/ALI>

If you're still having trouble, please contact the list owner at:

<mailto:listmaster@alipac.us>

The following physical address is associated with this mailing list:

AMERICANS FOR LEGAL IMMIGRATION PAC Post Office Box 30966 Raleigh, NC 27622-0966 Robert T. Quasius

Marshall, MN 56258

RECEIVED FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

2007 JAN 24 A 9:42

January 19, 2007

Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, D.C. 20463

MUR 5896

Enclosed is a formal complaint against the Americans for Legal Immigration PAC (ALIPAC) for violation of campaign finance laws.

This complaint is in addition to my earlier complaint dated January 3, 2007, and brings additional violations of the law to your attention.

Feel free to contact me (above) if you need further information.

Yours truly,

Robert T. Quasius

COMPLAINT

The Americans for Legal Immigration PAC is a Section 527 organization under various campaign finance laws.

Exhibit A is the most recent FEC summary of ALIPAC finances for 2005. According to this summary ALIPAC raised \$44,575 in individual contributions in 2006, but contributed only \$1,500 of this to candidates. Only 3% of funds raised went to candidates; the rest for salaries, travel expenses, Wall Street Journal subscription, etc. It is apparent that contributors were defrauded, believing that their contributions would be used to help candidates in their elections, while nearly all funds went to pay salaries.

In my opinion and belief, ALIPAC defrauded contributors by representing in numerous communications that ALIPAC is a PAC intended to elect candidates, when in actuality ALIPAC intended to fund salaries, etc. with contributions and very little for candidates.

Exhibit B is ALIPAC's on-line store in which ALIPAC branded merchandise is sold. There are numerous references to the on-line store on ALIPAC's main web site. However, there is no accounting for the on-line store's finances in any of their FEC reports. In my opinion and belief, ALIPAC merchandise sales are being diverted for the personal benefit of ALIPAC's leadership, contrary to State and Federal laws.

Additionally, according to ALIPAC's annual 2005 report, ALIPAC received \$1,317.79 from the Salvation Army on August 26, 2005. However, the Salvation Army is an IRS recognized charity, and upon information and belief it is unlawful for a PAC to accept contributions from an IRS recognized charity, and for charities to contribute to PACs.

Robert T. Quasius

Marshall, MN 56258

Signed and sworn before me

Notary of the State of Minnesota

1-19-2007



Exhibit A – ALIPAC FEC Report of Receipts and Disbursements

Presented by the Federal Election Commission - 2005-2006 Cycle

TRY A: <u>NEW SEARCH</u> RETURN TO: <u>FEC HOME PAGE</u>

AMERICANS FOR LEGAL IMMIGRATION PAC

C00405878	Non-Party Non-Qualified		North Carolina
Total Receipts:		\$46,143	
Transfers From Authorized:		\$0	
Individual Contributions:		\$44,575	
Other Committee Contributions:		\$250	
Other Loans:		\$0	
Non-Federal Transfers:		\$0	
Total Disbursements:		\$45,801	
Transfers To Authorized:		\$0	
Contributions To Other Committees:		\$1,500	
Independent Expenditures:		\$0	
Coordinated Expenditures:		\$0	
Individual Refunds:		\$0	
Other Committee Refunds:		\$0	
Other Loan Repayments:		\$0	
Non-Federal Expenditures:		\$0	

Beginning Cash: \$557 Latest Cash On Hand: \$900 Debts Owed By: \$0

Through: 11/27/2006

Exhibit B – ALIPAC Merchandise Web Page



Shop, sell or create what's on your mind.

■ Valentine's Day Shipping details

Your Account | Sign In | Cart: 0 items | Help

SHOP THE MARKETPLACE

Unique gifts, T-Shirts and more

Search:

Û Home > Marketplace >

SHOP CATEGORIES

- Apparel
- [^] ⋅ <u>Baby</u>
 - Housewares
 - · Hats & Bags
 - · Stickers, Buttons & **Magnets**
 - · Posters, Prints and More!

Line Store

ALIPA

C On

Apparel

Back to Top

Get your own free online store today

Subscribe to this shop's newsletter

Sign up and receive news and specials.



ALIPAC Ringer T \$15.69



ALIPAC Jr. Ringer T-**Shirt** \$17.79



ALIPAC Long Sleeve Dark T-Shirt \$25.19







ALIPAC Jr. Spaghetti
Tank
\$17.79



ALIPAC Hooded
Sweatshirt
\$26.19



ALIPAC Sweatshirt \$21.99



ALIPAC Boxer Shorts \$13.59

ALIPAC Classic Thong \$8.39

Baby



ALIPAC Kids T-Shirt \$14.69



ALIPAC Infant/Toddler
T-Shirt
\$9.39



ALIPAC Infant Creeper \$10.49



Housewares



ALIPAC Large Mug \$12.59



ALIPAC Mug \$11.49



ALIPAC Stein \$14.69



ALIPAC Tile Coaster \$5.69



ALIPAC Mousepad \$11.49



ALIPAC Wall Clock \$12.49



\$13.59

Hats & Bags Back to Top



ALIPAC Black Cap \$14.69



ALIPAC Trucker Hat \$11.49



ALIPAC Cap \$13.59



ALIPAC Tote Bag \$13.59



ALIPAC Messenger Bag \$20.89

Stickers, Buttons & Magnets



ALIPAC Rectangle
Magnet
\$2.59



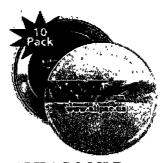
ALIPAC Rectangle Magnet (100 pack) \$89.19



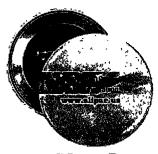
ALIPAC Rectangle Magnet (10 pack) \$11.49



ALIPAC Mini Button (10 pack) \$8.39



ALIPAC 2.25" Button
(10 pack)
\$10.50



ALIPAC Large Button \$1.29



<u>ALIPAC 2.25" Button</u> (100 pack) \$78.79



ALIPAC Mini Button \$0.99



ALIPAC Mini Button (100 pack) \$73.49



Boycott Miller Sticker (Rectangular) \$3.59

perfusion métorités WWW. Altpacius

ALIPAC Sticker
(Bumper)
\$4.09

Posters, Prints and More!



ALIPAC Calendar Print \$4.19



ALIPAC Christmas Cards (Package of 6) \$11.49



ALIPAC Postcards (Package of 8) \$6.29

Email Address



About Us Jobs Affiliate Program Contact Us Help



TEST ED 19-JAN

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Americans for Legal Immigration COMMISSION Political Action Committee

www.alipac.us

_2001 FEB -5 P 2: 33

Office of General Counsel Federal Election Commission 999 E. Street N.W. Washington, DC 20463

This letter is a response to the instructions from your office for us to answer the false charges made by Robert T. Quasius of Marshall, MN to your office on Jan. 10, 2006. (Reference MUR # 5896)

In his cover letter, Mr. Quasius falsely claims that his formal complaint is "for violations of campaign finance laws." Mr. Quasius has no evidence to offer that ALIPAC has violated any laws and ALIPAC makes every effort to maintain our good standing with the FEC and all state and federal agencies.

Mr. Robert T. Quasius makes three claims. The following as a response invalidating each:

Allegation #1:

Mr. Quasius claims that ALIPAC has "failed to submit accurate reports as required" because "According to Exhibit A, ALIPAC's report of receipts and disbursements through November 27, 2006, ALIPAC made cash contribution(s) of \$1,500 to the Committee to Elect John Jacob.

A review of ALIPAC's FEC reports indicate that we made only one donation of \$1,000 to the Committee to Elect John Jacob on 6/26/2006.

Furthermore, a review of our banking records (6/1/2006 through 11/27/2006) indicates that only one contribution was made to the Committee to Elect John Jacob on 6/26/2006 in the amount of \$1,000. Our banking records and FEC reports are accurate, and agree with each other. We will gladly give an FEC representative access to our account for verification purposes.

(Page 1 of 2)

Paid for by Americans for Legal Immigration

Allegation #2:

Mr. Quasius claims that we failed to list our endorsement list placed on our website at www.alipac.us as in kind contributions for the over 100 candidates endorsed there.

We have been told on several occasions by the FEC and Office of General Counsel that placing our endorsements on our website and encouraging people on our e-mail list to support them does not have to be listed as an In-Kind contribution as long as there are no extra costs associated with listing those we endorse. We confirmed this to be the case again today with a call to the office of General Counsel to make sure that our current reports that are being prepared will be accurate and reflect this understanding of the FEC guidelines.

Our endorsement page and e-mails on this matter only constitute a very small fraction of our online operations and the list was placed in public view as a normal part of our operations without extra expenditures. No additional costs were incurred by us in either compensated man-hours or service provider fees.

Allegation #3:

OMr. Quasius claims that our organization made expenditures for travel and long distance calls to support candidates that were not listed as in-kind contributions. He provides no evidence of this claim.

ALIPAC made no travel expenditures or phone calls at our expense to communicate our support of individual candidates to the public or voters. All travel expenses were for summits, conferences, debates, Congressional hearings, and other similar events, none of which were campaign-related.

Our calls were mostly answering media inquiries and to inform the campaigns of our endorsements.

We hope that these explanations satisfy your investigations, and that you will dismiss Mr. Robert (Bob) Quasius's complaint (MUR #5896). We also respectfully request a letter clearing us of these allegations, or other appropriate documentation showing this complaint as unfounded and dismissed.

We stand ready to assist your investigation anyway we can as we appreciate the public service your office offers to the citizens of America.

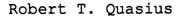
Dary/Jurbala

Treasurer, Americans for Legal Immigration PAC

COMMONWEAL TH OF PENNSYLVANIA

NOTARIAL SEAL

JANELL A HAMMOND, Notary Public New Hope Baio , Bucks County My Commission Expires June 21, 2008



Marshall, MN 56258

February 21, 2007

Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, D.C. 20463

Subject: Amended Complaint, MUR 5896

Enclosed is a formal complaint against the Americans for Legal Immigration PAC (ALIPAC) for violation of campaign finance laws.

This complaint amends my earlier complaints dated January 3, 2007 and January 19, 2007, and brings additional violations of the law to your attention.

I also have clarified two items from my previous complaints.

Feel free to contact me (above) if you need further information.

Yours truly,

Robert T. Quasius

2007 MAR - 1 A 10: 42

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

COMPLAINT

The Americans for Legal Immigration PAC is a Section 527 organization under various campaign finance laws.

Upon information and belief, based upon media reports and the absence of office expenses in disclosures, ALIPAC has always operated out of a home office, in the home of ALIPAC President William Gheen in Raleigh, North Carolina. The home office likely includes a full set of office equipment, such as a personal computer, supplies, desk, etc.

None of ALIPAC's FEC disclosures report any in-kind contributions from Mr. Gheen, reflecting the value of facilities provided by Mr. Gheen. Mr. Gheen is not a volunteer, since he has received a monthly salary since June 2004, and the time usage is likely much more than the commission's standards for incidental. Moreover, the value of the use of the home likely exceeds the \$5,000 annual individual contribution limit for individuals.

In my original complaint, dated January 3, 2007, I identified a discrepancy between reported ALIPAC contributions to candidates, and reported contributions received from ALIPAC in candidate FEC disclosures. I am now satisfied there is no discrepancy.

The discrepancy was identified based upon FEC on-line summaries. After making the complaint, I later compared images of the actual reports filed by ALIPAC and candidate committees. I believe the discrepancy resulted from sloppy handwriting in a date (either 6/20/2006 or 6/26/2006) for a \$1,000 contribution to the John Jacob Committee, which led it to be displayed twice on-line, which was misleading.

Also, I no longer believe profits may have been diverted from the ALIPAC on-line store to individual use. After making the complaint, I received information from someone who operates a similar store, and the item pricing at ALIPAC's store is such that no profits are earned, so there are no profits that could be diverted. However, I believe there is a reporting violation even if there was no profit, because no disbursements or receipts from the store were reported by ALIPAC.

Robert T. Quasius

Marshall, MN 56258

signed and sworn before me by Robert Tauasius on leb 21, 207

Notary of the State of Minnesota







Robert T. Quasius

Marshall, MN 56258

February 26, 2007

Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, D.C. 20463

Subject: Additional Evidence Related to MUR 5896

In support of my complaint about fraudulent fund raising by ALIPAC, enclosed are copies of additional fund raising e-mail from ALIPAC, which demonstrate contributors were often mislead about the purpose of fund raising campaigns. These communications were all obtained from ALIPAC's e-mail list server, at: http://lists.alipac.us/cgi-bin/dada/mail.cgi/archive/ALI/

ALIPAC's FEC disclosures show William Gheen has been paid a salary since mid-2004. During the 2005-2006 election cycle, most of ALIPAC's contributions went to fund William Gheen's salary and travel expenses. Only \$1,500, or 3%, of \$45,000 raised in 2005-2006 were reported as candidate contributions.

The April 1, 2005 e-mail states that no one at ALIPAC receives a salary, and that funds were needed to build "candidate campaign reserves." The February 16, 2006 claims building "candidate campaign reserves" but nothing about salaries.

The June 22, 2006 fund raising e-mail states funds are needed to make a contribution to the John Jacob campaign. Considerably more funds were previously raised for "candidate campaign reserves" than contributed.

The June 30, 2005 fund raising e-mail states funds are needed to fund long distance charges, postage, bandwidth, advertising, and office materials, but fails to mention that most of ALIPAC's spending is for salaries.

The August 29, 2006 e-mail states that funds are needed to support candidates, and again fails to mention that most of ALIPAC's spending is for salaries.

Feel free to contact me (above) if you need further information.

Yours truly.

Robert T. Quasius

2001 MAR -6 A:10: 45

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.: Dada Mail

:: ALIPAC Launches April Fund Raiser! ::

Dada Mail » Americans for Legal Immigration » Archives » ALIPAC Launches April Fund Raiser!

Date: April 1st, 2005

(Mailing List Information, including unsubscription instructions, is located at the end of this message.)

(Please forward and post)

Friends:

Americans for Legal Immigration PAC needs your support today. We are launching a multi-faceted fund raiser that will run till the end of April. We need our online friends that have not contributed to join and contribute today.

To Contribute Online or via mail Click Here http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

We need funds for several reasons. It is time for us to start building our campaign contribution reserves for candidates that stand with us in the 2006 elections. We will carefully screen candidates and allow our members to voice their opinions on which campaigns we endorse and contribute to. Those that support illegal immigration and open borders will be weighing in with millions of dollars. Americans must come to the table if we are to prevail.

To Take Action Now Click Here http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

ALIPAC also needs immediate contributions to help with our broader fund raising programs and membership drives. We have ordered thousands of pieces of letterhead and envelopes. We need money for postage to reach out to others that are not with us online yet. Won't you help us? For each dollar you contribute, we can reach out to three other people via snail mail.

To join and contribute now. Click here. http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

ALIPAC's web traffic has exploded. We received almost 700,000 page reads in March and that exceeds our total web traffic combined for the prior five months. If our popularity continues to grow at this rate, we will need thousands of dollars for a new high capacity server that can handle the traffic. Please help us to continue providing this information to more people around the nation.

To join and contribute now. Click Here http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

Our six executive officers are talented professionals. They work long hours on top of their existing jobs to make ALIPAC a reality. At this time, there are no salaries at ALIPAC. I personally am working a total of 70+ hours per week. We appreciate our volunteers and activists. Won't you support our work by contributing today?

To join and Contribute now. Click Here.

5,



http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

We have several outstanding pledges to contribute by mail that have not been received yet. If you have an outstanding pledge, you will receive a reminder in the mail next week. Please take care of this pledge today by mailing your personal check to:

AMERICANS FOR LEGAL IMMIGRATION PAC Post Office Box 30966, Raleigh, NC 27622-0966

or contributing online. http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

Please do not hesitate to contact me if I can be of any assistance to you or your efforts. My door is always open for questions and assistance.

Kind Regards,

William Gheen President, Americans for Legal Immigration PAC (ALIPAC) www.alipac.us Tel: (919) 787-6009 Toll Free: (866) 329-3999

Paid for by Americans for Legal Immigration

AMERICANS FOR LEGAL IMMIGRATION PAC Post Office Box 30966, Raleigh, NC 27622-0966 Tel: (919) 787-6009 Toll Free: (866) 329-3999 FEC ID: C00405878

The following information is a reminder of your current mailing list subscription:

You are subscribed to the following list: Americans for Legal Immigration

Using the following email: example@example.com

You may automatically unsubscribe from this list at any time by visiting the following URL:

<http://alipac.us/cgi-bin/dada/mail.cgi?
f=u&l=ALI&e=example@example.com&p=1234>;

If the above URL is inoperable, make sure that you have copied the entire address. Some mail readers will wrap a long URL and thus break

this automatic unsubscribe mechanism.

You may also change your subscription by visiting this list's main screen:

http://alipac.us/cgi-bin/dada/mail.cgi?f=list&l=ALI;

If you're still having trouble, please contact the list owner at:

<mailto:listmaster@alipac.us>;

The following physical address is associated with this mailing list:

AMERICANS FOR LEGAL IMMIGRATION PAC Post Office Box 30966 Raleigh, NC 27622-0966

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Mail

:: ALIPAC Endorses John Jacob Campaign for Congress ::

Dada Mail » Americans for Legal Immigration » Archives » ALIPAC Endorses John Jacob Campaign for Congress

mpaign for Congress

Date: June 22nd, 2006

Supporters of ALIPAC:

We need you to take immediate action. Election day in this primary race is next Tuesday on June 27.

Please take the following steps. Our goal is to channel as many votes, contributions, and volunteers into the John Jacob campaign as soon as possible.

- 1. Please read and distribute the press release below by sending it to all of your e-mail contacts (personal and media), posting it on blogs, announcing it on your show, etc... If you are new to our network and need some guidance write WilliamG@alipac.us
- 2. Please review the supporting articles to familiarize yourself with this race.
- 3. Our volunteers will receive specific instructions on how you can help the John Jacob campaign from home or by traveling to Utah to help this weekend. If you are not on our Volunteers list yet and want to help, must get on our volunteer list asap. Join this list via this link http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=4
- 4. ALIPAC will be making a direct contribution to the Jacob campaign Friday morning. Our board members will make that decision based on our current funds and our budget. If you would like to help the John Jacob campaign financially through ALIPAC, then please make an immediate donation to ALIPAC via this link http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

You can also make your own direct contribution to the Jacob campaign via their website at www.electjohnjacob.com

5. Our online activists will be fanning out on the web to spread the word. You can join those coordinated efforts by responding to the copy of this release in our Discussion Groups found here... http://www.alipac.us/modules.php? name=Forums&file=viewtopic&t=32246

ALIPAC Press Release to forward and post

John Jacob Campaign Endorsed by Americans for Legal Immigration PAC

http://www.alipac.us/modules.php? name=News&file=article&sid=1298&mode=thread&order=1&thold=0

Background information

Immigration splits Cannon, Jacob / Incumbent a U.S. lightning rod http://www.alipac.us/modules.php?

name=News&file=article&sid=1297&mode=thread&order=1&thold=0

Candidate John Jacob rips Chris Cannon, Bush http://www.alipac.us/modules.php? name=News&file=article&sid=1296&mode=thread&order=1&thold=0

Tom Tancredo's PAC targets Cannon in radio ads http://www.alipac.us/modules.php? name=News&file=article&sid=1295&mode=thread&order=1&thold=0

Congressman Cannon denounces own bill http://www.alipac.us/modules.php? name=News&file=article&sid=1294&mode=thread&order=1&thold=0

Our friends at Team America PAC, 9/11 Families for a Secure America, Vietnamese for Fair Immigration, and some of the Minutemen in Utah are already backing this campaign.

Team America says that Open Borders PACs like these below have started pumping over \$100,000 into the Cannon campaign due to his pro amnesty stance.

The Bush administration is rushing in to help Cannon because he was the point man in the House for the Guest Worker Amnesty push. Many of these PACs are the same PACs that tried to defeat Arizona's Proposition 200.

Home Depot, Inc;

United Parcel Services Inc; Wal-Mart Stores, Inc; Walt Disney Productions;

Independent Community Bankers of America; National Restaurant Association;

Hotel PAC; National Roofing Contractors, US Chamber, American Express:

California Farm Bureau; Dairy Farmers; International Council of Shopping

Centers; National Rural Letter Carriers; and Western Growers

We need to help John Jacob bring Cannon home. He needs money, volunteers, and votes on the ground in Utah! Support him directly or through ALIPAC.

More information to follow Friday Morning.

ALIPAC www.alipac.us

Paid for by Americans for Legal Immigration PAC Post Office Box 30966, Raleigh, NC 27622-0966 Tel: (919) 787-6009 Toll Free: (866) 329-3999 FEC ID: C00405878

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:: June Contribution Deadline Midnight Friday ::

<u>Dada Mail</u> » Americans for Legal Immigration » <u>Archives</u> » June Contribution Deadline Midnight Friday

Date: June 30th, 2005

ALIPAC Supporters:

The deadline for your contribution to our efforts to strengthen our next report must be received by Friday night at midnight. We must have your support to continue providing breaking news and stories of national interest. We need your help to sustain our operations and reach out to others. Long distance charges, postage, bandwidth, advertising, and office materials are essential and costly.

Candidates are already asking for funds as they line up to reflect your concerns in the 2006 elections and we must build up our resources.

For your contribution to reach us in time for this important report, please utilize our secure online contributions page at the link below.

Contribute Now http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

Thank you to all of you that have given time and funds to help build ALIPAC into a national force in short order.

Together, we will succeed and send a clear message to lawmaker to enforce our existing immigration laws.

Kind Regards,

William Gheen President, Americans for Legal Immigration PAC Post Office Box 30966, Raleigh, NC 27622-0966 Tel: (919) 787-6009 Toll Free: (866) 329-3999 FEC ID: C00405878

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.: Dada Mail

:: ALÎPAĈ Fund Raiser Update. Extended to Sept. 11 ::

<u>Dada Mail</u> » Americans for Legal Immigration » <u>Archives</u> » ALIPAC Fund Raiser Update. Extended to Sept. 11

Date: August 29th, 2006

Supporters of ALIPAC:

Thank you to all of you that have responded to our August fund raiser for ALIPAC. We have received a good response with several larger donations and many small donations.

While ALIPAC was designed to run off of small donations, we have reached a real cross roads. The demands on our organization far exceed our resources in labor and funds. We are in a constant state of triage and backlog doing our best to "Do what we can" in this struggle. Our projects are meeting with success, but we have not been aggressive in asking you for financial contributions.

Much of our mail has been delayed due to the time required for data entry and mail assembly on top of the many other projects running at ALIPAC. We are about 30% below where we need to be on this fund raiser due to the delay with the mail and the frequency of large donors is too low.

We are extending the fund raiser to Sept. 11, 2006 which is ALIPAC's two year anniversary. It is important that we hear back from you before then.

Your financial support is critical to our ability to continue and our ability to accomplish our primary goal of creating a national voter guide and supporting candidates that need our help. Working together, we have established one of the most effective national organizations fighting illegal immigration. We need your support to be able to grow and meet more of the needs placed on us.

Please discuss this effort with your families and see what you can do. While \$25 and \$50 contributions really add up, we must locate more donors that are willing to give \$100, \$250, \$500, or \$1,000 or more

We will do our best to get the remaining fund raising letters out by the end of this week and to get volunteers on the phones to call you and ask for donations.

Please take what action you can today to contribute to ALIPAC online or through the mail.

Your support is critical to our efforts and greatly appreciated.

To Contribute Online visit http://www.alipac.us/modules.php? name=Content&pa=showpage&pid=9

To Contribute by Mail, please send checks made out to ALIPAC (No business checks allowed) to..

ALIPAC PO Box 30966 Raleigh, NC 27622

Thank you for your support.



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